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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

THE ROMAN CATHOLIC ARCHBISHOP OF
SAN FRANCISCO,

Debtor and Debtor in Possession.

Case No.: 23-30564

Chapter 11

***EX PARTE APPLICATION OF THE
OFFICIAL COMMITTEE OF UNSECURED
CREDITORS FOR ENTRY OF AN ORDER
PURSUANT TO BANKRUPTCY RULE 2004
AUTHORIZING ORAL EXAMINATION
AND PRODUCTION OF DOCUMENTS BY
(1) DEBTOR, THE ROMAN CATHOLIC
ARCHBISHOP OF SAN FRANCISCO; (2)
THE ARCHDIOCESE OF SAN FRANCISCO
PARISH, SCHOOL AND CEMETERY
JURIDIC PERSONS CAPITAL ASSETS
SUPPORT CORPORATION; AND (3) THE
ARCHDIOCESE OF SAN FRANCISCO
PARISH AND SCHOOL JURIDIC PERSONS
REAL PROPERTY SUPPORT
CORPORATION; AND DECLARATION OF
BRITTANY M. MICHAEL IN SUPPORT
[FILED CONCURRENTLY HEREWITH]***

The Official Committee of Unsecured Creditors (the “Committee”) appointed in the above-captioned chapter 11 bankruptcy case (the “Case”) of The Roman Catholic Archbishop of San Francisco, a California corporation, debtor and debtor in possession (the “Debtor”), hereby files this *ex parte* application (the “Application”) under Federal Rule of Bankruptcy Procedure 2004 (“Rule 2004”) and Local Bankruptcy Rule 2004-1 (“Local Rule 2004-1”) for entry of an order authorizing

the Committee to subpoena each of (1) the Debtor; (2) The Archdiocese of San Francisco Parish, School and Cemetery Juridic Persons Capital Assets Support Corporation (“CASC”); and (3) The Archdiocese of San Francisco Parish and School Juridic Persons Real Property Support Corporation (“RPSC”, together with CASC, the “Support Corporations”) to (a) complete its production, by **June 5, 2024**, of documents responsive to the Requests for Production (the “Requests”) set forth substantially in the form attached hereto as **Exhibit 1**; and (b) to provide oral testimony, on a mutually agreed date, no later than **July 2, 2024**, relating to (i) the search for and possession, custody, or control of documents responsive to the Requests; (ii) the formation of and transfer of assets into each of the Support Corporations; and (iii) the assertions of ownership or beneficial interests in any assets transferred into the Support Corporations.

I. PRELIMINARY STATEMENT

The Debtor referred to itself in a San Francisco Superior Court proceeding (the “Tax Case”) as “the ‘hub of the wheel’ around which . . . religious purpose corporations are connected.” *Declaration of Brittany M. Michael*, filed concurrently herewith (“Michael Decl.”), Ex. 1 at 4. The Support Corporations, CASC and RPSC, are two such corporations. In 2007, as part of a self-described “internal church restructuring” (*id.* at 2), the Debtor created the Support Corporations. *See Declaration of Joseph J. Passarello in Support of Chapter 11 Petition and Debtor’s Emergency Motions* [Doc. No. 14] (“Passarello Decl.”), ¶¶ 22, 26.

The Requests seek documents concerning the creation of the Support Corporations. In the Tax Case, the City and County of San Francisco concluded that the Debtor wanted to “demonstrate, when, if and as necessary, that both of its pockets are empty in order to protect its assets from future litigants’ claims or other liabilities.” *Michael Decl.*, Ex. 1 at 1. These “future litigants” have now filed more than 550 proofs of claim for childhood sexual abuse in this Case.

After forming the Support Corporations, the Debtor transferred assets to each of them. In or about April 2008, the Debtor transferred to RPSC at least 232 real properties in the City and County of San Francisco alone. *See Michael Decl.*, Ex. 2 at page 8 of Verified Complaint. According to the Debtor, “the real property and capital assets of the parishes and schools were *entrusted*, respectively” to RPSC and CASC. *Id.*, Ex. 1 at 9 n.10 (emphasis added). The Debtor explained to the Superior

1 Court that the “entrustment” of property from the Debtor to RPSC “was not a sale,” (*id.* at 10 n.11),
2 but rather was merely an “internal church restructuring” of the Debtor. *Id.* at 2. The Debtor asserted
3 in the Tax Case that the beneficial ownership in the assets now held by the Support Corporations did
4 not change and does not rest in the Support Corporations. *Id.* at 37. By these Requests, the
5 Committee seeks production of documents that will permit it to investigate for whose benefit those
6 assets were entrusted and whether those assets are property of the estate.

7 The Committee seeks documents from the Debtor because of its intimate connection to the
8 Support Corporations and its central role in their creation. Each of the Support Corporations has a
9 board of directors “comprised of the Archbishop himself or persons appointed by the Archbishop *at*
10 *his pleasure* or confirmed by the Archbishop, in *his sole discretion*.” *Id.* at 34 (*italics in original*).¹

11 As authorized by Rule 2004, the Committee seeks information from the Debtor, CASC, and
12 RPSC about the acts, conduct, and property of the Debtor. The Committee seeks this information
13 now, prior to engaging in mediation to resolve this Case, to assess whether the transferred assets are
14 property of the estate based on, among other things, (a) the formation and organization of CASC and
15 RPSC, (b) the transfer of potential property of the estate into CASC and RPSC, and (c) the control of
16 the Debtor’s enterprise vis-à-vis the Support Corporations. The Committee brings this Application to
17 carry out its duties under section 1103 of the Bankruptcy Code, 11 U.S.C. § 101, et seq. (the
18 “Bankruptcy Code”), and to work to maximize unsecured creditors’ recoveries in this Case.

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21 [remainder of page left intentionally blank]
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26 ¹ The boards of directors of the Support Corporations include seven members: three must be members of the Archdiocese
27 Financial Council and four must be members of the Archdiocese College of Consultors. *See* Michael Decl., Ex. 1 at 34.
28 “[I]t is the Archbishop who appoints (and can remove) each of the members of the Finance Council and the College of
Consultors.” *Id.* at 35. Further, “the Archbishop has the sole discretion to confirm that members of the Finance Council
and the College of Consultors satisfy the canonical standards necessary for membership on” the boards of CASC and
RPSC. *Id.*

II. RELEVANT FACTS

A. Background

On August 21, 2023, the Debtor commenced the Case by filing a voluntary petition for relief under chapter 11 of the Bankruptcy Code. Pursuant to sections 1107(a) and 1108 of the Bankruptcy Code, the Debtor continues to operate as a debtor in possession.

In his first-day declaration, Joseph J. Passarello, the Debtor's Chief Financial Officer, described several entities that make up the Debtor's enterprise. Among other things, Mr. Passarello identified CASC and RPSC as two of the "Catholic-based . . . organizations that operate within the Archdiocese." Passarello Decl. at ¶¶ 15, 22, and 26.

On September 1, 2023, the United States Trustee (the "UST") appointed the Committee. The Committee consists of nine individuals who were sexually abused as minors by perpetrators for whom the Debtor was responsible. *See Appointment of Committee of Unsecured Creditors* [Doc. No. 58]. On October 24, 2023, the Court granted the Committee's application to employ Pachulski Stang Ziehl & Jones LLP as its counsel. *See* Doc. No. 237.

III. JURISDICTION

This Court has subject matter jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409. The statutory predicates for the relief sought herein are Bankruptcy Code §§ 1103 and 1109(b) and Rule 2004.

IV. RELIEF REQUESTED

The Committee respectfully requests that the Court enter an *ex parte* order authorizing the Committee to issue subpoenas requiring the Debtor, CASC, and RPSC to (1) complete their productions, by June 5, 2024, of documents responsive to the Requests, and (2) provide oral testimony, on mutually agreed dates no later than July 2, 2024, relating to (a) the search for and possession, custody, or control of documents responsive to the Requests and (b) the formation of and transfer of assets into each of the Support Corporations and the assertions of ownership or beneficial interests in any assets transferred to the Support Corporations.

1 The Requests to be served on each of the Debtor, CASC, and RPSC are substantively
2 identical. The Committee does not seek duplicative information, but does not know which entities are
3 in possession of the complete universe of documents responsive to the Requests. Moreover, the
4 Archdiocese's intimate connection to the Boards of Directors of CASC and RPSC makes it probable
5 that the Debtor is in possession, custody, or control of all documents responsive to these Requests.
6 The Committee will work with counsel for the Debtor, CASC, and RPSC to limit a duplication of
7 efforts. In addition, the Committee has endeavored for the Requests not to duplicate the financial-
8 oriented document requests that the Committee has served on the Debtor, CASC, and RPSC pursuant
9 to a prior order granting Rule 2004 authorization for production of documents. *See* Doc. 383.

10 **V. BASIS FOR RELIEF**

11 Local Rule 2004-1 provides: "The Clerk may issue on behalf of the Court, *ex parte* and
12 without notice, orders granting applications for examination of an entity pursuant to Bankruptcy
13 Rule 2004(a)." *See* L.B.R. 2014-1(a). The Committee brings this Application *ex parte* pursuant to
14 Local Rule 2004-1 seeking an order without a hearing. The Committee commits to meet with the
15 Debtor, CASC, and RPSC to discuss these Requests and avoid duplication of efforts among them.
16 However, objections to the underlying Requests do not constitute grounds to oppose or delay the
17 granting of this Application.

18 Pursuant to Rule 2004(b), a party in interest may seek both document and oral discovery
19 related to "acts, conduct, or property of the liabilities and financial condition of the debtor, or to any
20 matter which may affect the administration of the debtor's estate, or to the debtor's right to a
21 discharge." Under Rule 2004(c), the "attendance of an entity for examination and the production of
22 documents . . . may be compelled in the manner provided in Rule 9016 for the attendance of
23 witnesses at a hearing or trial." Bankruptcy Rule 9016 makes Rule 45 of the Federal Rules of Civil
24 Procedure (governing subpoenas) applicable in cases under the Bankruptcy Code. Unlike discovery
25 under the Federal Rules of Civil Procedure (the "Civil Rules"), discovery under Rule 2004 can be
26 used as a "pre-litigation discovery device." *In re Wilson*, 2009 WL 304672, at *5 (Bankr. E.D. La.
27 2009). As such, a Rule 2004 motion need not be tied to specific factual allegations at issue between
28 parties. *In re Symington*, 209 B.R. 678, 683 (Bankr. D. Md. 1997) (providing that Rule 2004 permits

1 “examination of any party without the requirement of a pending adversary proceeding or contested
2 matter”).

3 “[T]he scope of a Rule 2004 examination is ‘unfettered and broad’; the rule essentially
4 permits a ‘fishing expedition.’” *Rigby v. Mastro (In re Mastro)*, 585 B.R. 587, 597 (9th Cir. BAP
5 2018) (citations omitted). In addition, a Rule 2004 examination “ may ‘extend to third parties who
6 have had dealings with the debtor.’” *Id.* (quoting *In re Fin. Corp. of Am.*, 119 B.R. 728, 733 (Bankr.
7 C.D. Cal. 1990)).

8 The Committee proposes Rule 2004 investigations of the Debtor and the Support
9 Corporations that “have had dealings” with the Debtor. This investigation will, among other things,
10 assist the Committee to fulfill its statutory duty to “investigate the acts, conduct, assets, liabilities, and
11 financial condition of the debtor.” Bankruptcy Code § 1103(c)(2). The relief requested in this
12 Application will enable a more efficient investigation by reducing the time, burden, and cost that
13 would be incurred through separate applications for each of the three entities. Moreover, the
14 substantive rights of any party to object to or modify the information requested by the Committee will
15 not be reduced or expanded by the relief requested.

16 Here, the requested relief for document production and oral examinations is well within the
17 scope of Rule 2004. The Committee seeks to maximize creditor recoveries in this Case and, thus,
18 applies to investigate available assets through the Requests and the potential oral examination topics.
19 After issuing the proposed subpoena to the Debtor, the Committee intends to work cooperatively with
20 counsel for the Debtor, CASC, and RPSC— as necessary—regarding the Requests.

21 **VI. NO PRIOR REQUEST**

22 No prior request for the relief sought in this Application has been made to this or any other
23 Court.

24 **VII. NOTICE**

25 Local Rule 2004-1 provides that this Application can be brought “ex parte and without
26 notice.” L.B.R. 2014-1(a). Nevertheless, notice of this Motion will be provided to (a) the UST,
27 (b) counsel to the Debtor, (c) counsel for CASC, (d) counsel for RPSC, and (e) all parties listed on the
28 Limited Service List (as of April 25, 2024) [Doc. No. 625].

VIII. CONCLUSION

For the reasons set forth above, the Committee respectfully requests that the Court grant this Motion. A proposed order granting this Motion is attached hereto as **Exhibit 2**.

Dated: May 8, 2024

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Andrew W. Caine

James I. Stang (CA Bar No. 94435)

Andrew W. Caine (CA Bar No. 110345)

Gillian N. Brown (CA Bar No. 205132)

Brittany M. Michael (*admitted pro hac vice*)

Counsel to the Official Committee of Unsecured
Creditors

EXHIBIT 1
Requests for Production of Documents

PACHULSKI STANG ZIEHL & JONES LLP
ATTORNEYS AT LAW
SAN FRANCISCO, CALIFORNIA

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EXHIBIT 1
INSTRUCTIONS

- A. Unless otherwise specified, each request seeks DOCUMENTS dated or created during the ten (10) years prior to the PETITION DATE.**
- B. Please bates number each page of each DOCUMENT that YOU produce.**
- C. YOU are required to conduct a thorough investigation and produce all DOCUMENTS (as defined below) in YOUR possession, custody, and control.**
- D. All/Any/Each. The terms “all,” “any,” and “each” shall each be construed as encompassing any and all.**
- E. And/Or. The connectives “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside of its scope.**
- F. The use of the singular form of any word includes the plural and vice versa.**
- G. If YOU are unable to comply with a particular category(ies) of the requests below and DOCUMENTS responsive to the category are in existence, state the following information:**
1. The date of the DOCUMENT;
 2. The type of DOCUMENT (e.g., letter, memorandum, report, etc.);
 3. The name, address, telephone number and title of the author(s) of the DOCUMENT;
 4. The name, address, telephone number and title of EACH recipient of the DOCUMENT;
 5. The number of pages in the DOCUMENT;
 6. The document control number, if any;
 7. The present location(s) of the DOCUMENT and the name, address and telephone number of the person(s) who has (have) possession of the DOCUMENT;
 8. A specific description of the subject matter of the DOCUMENT;
 9. The reason why the DOCUMENT cannot be produced or why you are unable to comply with the particular category of request.

1 **H. YOU are under a continuing duty to amend YOUR written response and to produce**
2 **additional DOCUMENTS if you learn that the response or production is incomplete or**
3 **incorrect in any material respect, and if the additional or corrective information has not**
4 **otherwise been made known to the COMMITTEE during the discovery process or in**
5 **writing.**

6 **I. YOU are required to produce the full and complete originals, or copies if the originals**
7 **are unavailable, of each DOCUMENT responsive to the categories below along with all**
8 **non-identical copies and drafts in its or their entirety, without abbreviations, excerpts,**
9 **or redactions. A copy may be produced in lieu of originals if the entirety (front and**
10 **back where appropriate) of the DOCUMENT is reproduced and YOU state by**
11 **declaration under penalty of perjury that the copy provided is a true, correct, complete,**
12 **and accurate duplication of the original.**

13 **J. YOU are required to produce the DOCUMENTS as they are kept in the usual course of**
14 **business, or to organize and label them to correspond with each category in these**
15 **requests.**

16 **K. For ELECTRONICALLY STORED INFORMATION (“ESI”):**

- 17 1. The Committee seeks to discuss with the Debtor and/or Producing Party to whom
18 these Requests are directed (a) potential search terms for ESI responsive to each
19 Request; (b) the potential custodians of ESI responsive to each Request and (c) the
20 devices to be searched for ESI responsive to each Request.
- 21 2. Produce DOCUMENTS in accordance with the instructions at
22 [https://support.everlaw.com/hc/en-us/articles/360004962052-Standard-Format-for-](https://support.everlaw.com/hc/en-us/articles/360004962052-Standard-Format-for-Processed-Data)
23 [Processed-Data](https://support.everlaw.com/hc/en-us/articles/360004962052-Standard-Format-for-Processed-Data)
- 24 3. Maintain family integrity.
- 25 4. Perform custodian-level de-duplication.
- 26 5. Produce a DAT load file with the following metadata fields: Beginning Production
27 Number, Ending Production Number, Beginning Attachment Number, End
28 Attachment Number, Family ID, Page Count, Custodian, Original Location Path,

Email Folder Path, Document Type, Doc Author, Doc Last Author, Comments, Categories, Revisions, File Name, File Size, MD5 Hash, Date Last Modified, Time Last Modified, Date Created, Time Created, Date Last Accessed, Time Last Accessed, Date Sent, Time Sent, Date Received, Time Received, To, From, CC, BCC, Email Subject, Path to Native, Path to Full Text, Original Time Zone.

6. Process all data in UTC and provide a metadata field indicating original time zone.

L. If YOU withhold or redact a portion of any DOCUMENT under a claim of privilege or other protection, then the DOCUMENT must be identified on a privilege log, which shall be produced contemporaneously with the non-privileged DOCUMENTS responsive to this Request for Production, and which privilege log shall state the following information:

1. The date of the DOCUMENT;
2. The type of DOCUMENT (e.g., letter, memorandum, report, etc.);
3. The name, address, telephone number and title of the author(s) of the DOCUMENT;
4. The name, address, telephone number and title of each recipient of the DOCUMENT;
5. The number of pages in the DOCUMENT;
6. The document control number, if any;
7. The present location(s) of the DOCUMENT and the name, address and telephone number of the person(s) who has (have) possession of the DOCUMENT;
8. A general description of the subject matter of the DOCUMENT or the portion redacted without disclosing the asserted privileged or protected communication;
9. The specific privilege(s) or protection(s) that YOU contend applies.

DEFINITIONS

1. “ARCHDIOCESE” means the geographic territory under the jurisdiction of the DEBTOR, as set forth in footnote 2 to the PASSARELLO DECL.

2. “CASC” refers to The Archdiocese of San Francisco Parish, School and Cemetery Juridic Persons Capital Assets Support Corporation (as discussed in the PASSARELLO DECL. at ¶ 22) and all of its agents, accountants, advisors, employees, experts, attorneys, financial advisors,

officers, directors, direct or indirect shareholders, members, representatives, affiliates, subsidiaries, divisions, predecessors, and/or successors.

3. “COMMUNICATION” means the transmittal of information (in the form of facts, ideas, inquiries, or otherwise).

4. “CONCERNING” means relating to, referring to, describing, evidencing, or constituting.

5. “DEBTOR” refers to The Roman Catholic Archbishop of San Francisco, the debtor and debtor in possession in the BANKRUPTCY CASE, and all its agents, accountants, advisors, employees, experts, attorneys, financial advisors, BANKRUPTCY CASE professionals, officers, directors, direct or indirect shareholders, members, representatives, affiliates, subsidiaries, divisions, predecessors, and/or successors.

6. “DOCUMENT” is synonymous in meaning and equal in scope to the usage of the term “documents or electronically stored information” in Federal Rule of Civil Procedure 34(a)(1)(A). A draft or non-identical copy is a separate document within the meaning of this term. A DOCUMENT includes written COMMUNICATIONS.

7. IDENTIFY means to give, to the extent known, the PERSON’s full name, present or last known address; and when referring to a natural PERSON, additionally, the present or last known place of employment.

8. “PASSARELLO DECL.” refers to the *Declaration of Joseph J. Passarello in Support of Chapter 11 Petition and Debtor’s Emergency Motions*, filed at Docket No. 14 in the BANKRUPTCY CASE.

9. “PERSONAL PROPERTY” means tangible and intangible assets other than REAL PROPERTY.

10. “PERSON” is any natural person, juridical person, or any legal entity, including, without limitation, any business, religious, or governmental entity or association.

11. “PROPERTY” means and includes PERSONAL PROPERTY and REAL PROPERTY.

12. “RPSC” means and refers to the Archdiocese of San Francisco Parish and School Juridic Persons Real Property Support Corporation (as discussed at PASSARELLO DECL. at ¶ 26) and includes all of its agents, accountants, advisors, employees, experts, attorneys, financial advisors, officers, directors, direct or indirect shareholders, members, representatives, affiliates, subsidiaries, divisions, predecessors, and/or successors.

13. “REAL PROPERTY” means land and immovable property on land, such as buildings.

14. “TRUST” means a legal entity under a TRUST AGREEMENT.

15. “TRUST AGREEMENT” means to a written or oral arrangement that evidences, or purports to evidence, a TRUST; and includes declarations of trust and all amendments to such arrangements.

DOCUMENT REQUESTS

Documents relating to CASC

1. All COMMUNICATIONS prior to the incorporation of CASC CONCERNING the formation of CASC or any entity that would serve a similar function to CASC.

This Request seeks COMMUNICATIONS CONCERNING the origins of the concept of forming CASC, permissions requested or granted CONCERNING the formation of CASC, and considerations of whether and how to form CASC. This Request includes, but is not limited to, any COMMUNICATIONS involving the institutions of and PERSONS working within the DEBTOR, the Roman Catholic Church, the Vatican, or the Holy See (Congress for Bishops).

2. DOCUMENTS sufficient to IDENTIFY the PERSONS ultimately responsible for approving the decision to form CASC.
3. All DOCUMENTS CONCERNING the reasons for forming CASC or any entity that would serve a similar function to CASC.
4. All DOCUMENTS CONCERNING the proposed or actual transfer of PROPERTY, whether or not located in the ARCHDIOCESE, from any PERSON to CASC. This Request seeks DOCUMENTS CONCERNING which PROPERTY to transfer, which PROPERTY not to be transferred, and the documentation of the transfers.
5. DOCUMENTS sufficient to IDENTIFY the PERSONS who determined which PROPERTIES ultimately were transferred to CASC.
6. All DOCUMENTS CONCERNING the asserted ownership interests in any PROPERTY transferred to CASC at any time. This Request includes, but is not limited to, TRUST AGREEMENTS, assertions of ownership interests or beneficial interests in such PROPERTY, and assessments or opinions of ownership interests or beneficial interests in such PROPERTY.

Documents relating to RPSC

7. All COMMUNICATIONS prior to the incorporation of RPSC CONCERNING the formation of RPSC or any entity that would serve a similar function to RPSC.

This Request seeks COMMUNICATIONS CONCERNING the origins of the concept of forming RPSC, permissions requested or granted CONCERNING the formation of RPSC, and considerations of whether and how to form RPSC. This Request includes, but is not limited to, any COMMUNICATIONS involving the institutions of and PERSONS working within the DEBTOR, the Roman Catholic Church, the Vatican, or the Holy See (Congress for Bishops).

8. DOCUMENTS sufficient to IDENTIFY the PERSONS ultimately responsible for approving the decision to form RPSC.
9. All DOCUMENTS CONCERNING the reasons for forming RPSC or any entity that would serve a similar function to RPSC.
10. All DOCUMENTS CONCERNING the proposed or actual transfer of PROPERTY, whether or not located in the ARCHDIOCESE, from any PERSON to RPSC. This Request seeks DOCUMENTS CONCERNING which PROPERTY to transfer, which PROPERTY not to be transferred, and the documentation of the transfers.
11. DOCUMENTS sufficient to IDENTIFY the PERSONS who determined which PROPERTIES ultimately were transferred to RPSC.
12. All DOCUMENTS CONCERNING the asserted ownership interests in any PROPERTY transferred to RPSC at any time. This Request includes, but is not limited to, TRUST AGREEMENTS, assertions of ownership interests or beneficial interests in such PROPERTY, and assessments or opinions of ownership interests or beneficial interests in such PROPERTY.

Tax Case

13. 13. All DOCUMENTS submitted in the action commenced in or about December 2008 before the City and County of San Francisco Review Property Transfer Tax Review Board by the Debtor's *Petition to Review Transfer Tax Determination pursuant to SF Transfer Tax Ordinance § 1115.2*.

-end-

EXHIBIT 2
Proposed Form of Order Ex Parte Application

PACHULSKI STANG ZIEHL & JONES LLP
ATTORNEYS AT LAW
SAN FRANCISCO, CALIFORNIA

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Counsel to the Official Committee of Unsecured Creditors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

THE ROMAN CATHOLIC ARCHBISHOP OF
SAN FRANCISCO,

Debtor and Debtor in Possession.

Case No.: 23-30564

Chapter 11

**ORDER GRANTING EX PARTE
APPLICATION OF THE OFFICIAL
COMMITTEE OF UNSECURED
CREDITORS FOR ENTRY OF AN ORDER
PURSUANT TO BANKRUPTCY RULE 2004
AUTHORIZING ORAL EXAMINATION
AND PRODUCTION OF DOCUMENTS BY
(1) DEBTOR, THE ROMAN CATHOLIC
ARCHBISHOP OF SAN FRANCISCO; (2)
THE ARCHDIOCESE OF SAN FRANCISCO
PARISH, SCHOOL AND CEMETERY
JURIDIC PERSONS CAPITAL ASSETS
SUPPORT CORPORATION; AND (3) THE
ARCHDIOCESE OF SAN FRANCISCO
PARISH AND SCHOOL JURIDIC PERSONS
REAL PROPERTY SUPPORT
CORPORATION**

Upon consideration of the *Ex Parte Application of the Official Committee of Unsecured Creditors for Entry of an Order Pursuant to Bankruptcy Rule 2004 Authorizing Oral Examination and Production of Documents by the Debtor, The Roman Catholic Archbishop of San Francisco, The Archdiocese of San Francisco Parish, School and Cemetery Juridic Persons Capital Assets Support Corporation, and The Archdiocese of San Francisco Parish and School Juridic Persons Real*

1 *Property Support Corporation* (the “Application”), the record in this case, and for good and
2 sufficient cause appearing,

3 IT IS HEREBY ORDERED AS FOLLOWS:

4 1. The Application is GRANTED.

5 2. The Committee is authorized to issue subpoenas directed to the Debtor,¹ CASC, and
6 RPSC requiring each of them to (a) complete its production, by **June 5, 2024**, of documents
7 responsive to the Requests set forth substantially in the form attached to the Application as **Exhibit 1**;
8 and (b) to provide oral testimony on mutually agreed dates no later than **July 2, 2024**, relating to (i)
9 the search for and possession, custody, or control of documents responsive to the Requests; (ii) the
10 formation of and transfer of assets into each of the Support Corporations; and (iii) the assertions of
11 ownership or beneficial interests in any assets transferred into the Support Corporations..

12 ****END OF ORDER****

13 4877-6630-3675, v. 9

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¹ All terms not otherwise defined in this Order shall have the meanings ascribed to them in the Application.

James I. Stang (CA Bar No. 94435)
Andrew W. Caine (CA Bar No. 110345)
Gillian N. Brown (CA Bar No. 205132)
Brittany M. Michael (*admitted pro hac vice*)
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Counsel to the Official Committee of Unsecured Creditors

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

THE ROMAN CATHOLIC ARCHBISHOP OF
SAN FRANCISCO,

Debtor and Debtor in Possession.

Case No.: 23-30564

Chapter 11

CERTIFICATE OF SERVICE

1 STATE OF CALIFORNIA)
2 CITY OF LOS ANGELES)

3 I, Maria R. Viramontes, am employed in the city and county of Los Angeles, State of
4 California. I am over the age of 18 and not a party to the within action; my business address is 10100
Santa Monica Blvd., Suite 1300, Los Angeles, California 90067.

5 On May 8, 2024, I caused to be served the **EX PARTE APPLICATION OF THE OFFICIAL**
6 **COMMITTEE OF UNSECURED CREDITORS FOR ENTRY OF AN ORDER PURSUANT TO**
7 **BANKRUPTCY RULE 2004 AUTHORIZING ORAL EXAMINATION AND PRODUCTION OF**
8 **DOCUMENTS BY (1) DEBTOR, THE ROMAN CATHOLIC ARCHBISHOP OF SAN FRANCISCO;**
9 **(2) THE ARCHDIOCESE OF SAN FRANCISCO PARISH, SCHOOL AND CEMETERY JURIDIC**
10 **PERSONS CAPITAL ASSETS SUPPORT CORPORATION; AND (3) THE ARCHDIOCESE OF**
11 **SAN FRANCISCO PARISH AND SCHOOL JURIDIC PERSONS REAL PROPERTY SUPPORT**
12 **CORPORATION; AND DECLARATION OF BRITTANY M. MICHAEL IN SUPPORT** in the
13 manner stated below:

11 <input checked="" type="checkbox"/>	TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document was served by the court via NEF and hyperlink to the document. On May 8, 2024, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below. See Attached
17 <input checked="" type="checkbox"/>	(BY MAIL) I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at Los Angeles, California, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit. The Honorable Judge Dennis Montali United States Bankruptcy Court Northern District of California 450 Golden Gate Avenue, 16th Floor San Francisco, CA 94102 See Attached
22 <input checked="" type="checkbox"/>	(BY EMAIL) I caused to be served the above-described document by email to the parties indicated on the attached service list at the indicated email address. See Attached.

24 I declare under penalty of perjury, under the laws of the State of California and the United
25 States of America that the foregoing is true and correct.

26 Executed on May 8, 2024, at Los Angeles, California.

27 /s/ Maria R. Viramontes
28 Maria R. Viramontes

TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):

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Via Email and U.S. Mail

**Roman Catholic Archbishop of San Francisco
Limited Service List**

Description	Name	Address	Fax	Email
*NOA - Request for Notice	A.S.	Attn: Kim Dougherty, Esq. Just Law Collaborative 210 Washington St N Easton, MA 02356	385-278-0287	kim@justcelc.com
Debtor's Counsel, Registered ECF User	Amanda L. Cottrell			acottrell@sheppardmullin.com JHerschap@sheppardmullin.com
*NOA Counsel for Junipero Serra High School/Counsel for Marin Catholic High School/Counsel for Riordan High School/Counsel for Salesian Society, Registered ECF User	Binder & Malter, LLP	Attn: Robert G Harris 2775 Park Ave Santa Clara, CA 95050		rob@bindermalter.com robertw@bindermalter.com
Registered ECF User	Burns Bair LLP	Jesse Bair		jbair@burnsbair.com aturgeon@burnsbair.com
*NOA - Request for Notice	C.B.	Attn: Kim Dougherty, Esq. Just Law Collaborative 210 Washington St N Easton, MA 02356	385-278-0287	kim@justcelc.com
Corresponding State Agencies	California Department of Tax And Fee Admin	P.O. Box 942879 Sacramento, CA 94279		
The Office of the California Attorney General	California Office of the Attorney General	1300 I St, Ste 1142 Sacramento, CA 95814		
Registered ECF User on behalf of Creditor Victoria Castro	Cheryl C. Rouse	Attn: Annette Rolain		rblaw@ix.netcom.com
*NOA - Counsel for Century Indemnity Company, Pacific Indemnity Company, and Westchester Fire Insurance Company	Clyde & Co US LLP	Attn: Alexander Potente Attn: Jason J Chorley 150 California St, 15th Fl San Francisco, CA 94111	415-365-9801	alex.potente@clydeco.us jason.chorley@clydeco.us
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Registered ECF User on behalf of Interested Party Certain Underwriters at Lloyds London and Certain London Market Companies	Clyde & Co US LLP	Attn: Nancy Lima Attn: Yongli Yang Attn: Jason J Chorley Attn: Daniel James Attn: Michael Norton		Nancy.Lima@clydeco.us yongli.yang@clydeco.us jason.chorley@clydeco.us Robert.willis@clydeco.us daniel.james@clydeco.us michael.norton@clydeco.us
Corresponding State Agencies	Colorado Department of Revenue	1881 Pierce St Lakewood, CO 80214		
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*NOA - Request for Notice	D.R.	Attn: Kim Dougherty, Esq. Just Law Collaborative 210 Washington St N Easton, MA 02356	385-278-0287	kim@justcelc.com
*NOA - Counsel for St. Paul Fire and Marine Insurance Company and Travelers Casualty and Surety Company, Employers Reinsurance Corporation, Appalachian Insurance Company, First State Insurance Company, and The Insurance Company of North America, Registered ECF User	Dentons US LLP	Attn: Joshua Haevernick 1999 Harrison St, Ste 1300 Oakland, CA 94612	415-882-0300	joshua.haevernick@dentons.com

**Roman Catholic Archbishop of San Francisco
Limited Service List**

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Registered ECF User on behalf of Interested Party Certain Underwriters at Lloyds London and Certain London Market Companies	Duane Morris LLP	Nathan W Reinhardt Andrew Mina Jeff D Kahane Betty Luu		nreinhardt@duanemorris.com amina@duanemorris.com JKahane@duanemorris.com BLuu@duanemorris.com
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Corresponding State Agencies	Employment Development Department	P.O. Box 989061 West Sacramento, CA 95798		
*NOA - Counsel for Abuse Claimant	Estey & Bomberger, LLP	Attn: Stephen Estey 2869 India St San Diego, CA 92103	619-295-0172	steve@estey-bomberger.com
Debtors' Counsel	Felderstein Fitzgerald Willoughby Pascuzzi & Rios LLP	Attn: Paul Pascuzzi Attn: Thomas Phinney Attn: Jason Rios 500 Capitol Mall, Ste 2250 Sacramento, CA 95814		ppascuzzi@ffwplaw.com tphinney@ffwplaw.com jrios@ffwplaw.com docket@ffwplaw.com
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*NOA - Request for Notice	Fiore Achermann	Attn: Sophia Achermann 605 Market St, Ste 1103 San Francisco, CA 94105	415-550-0605	sophia@theFAfirm.com
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Fee Examiner	Frejka PLLC	Attn: Elise S. Frejka		Efrejka@frejka.com
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*NOA - Request for Notice	H.F.	Attn: Kim Dougherty, Esq. Just Law Collaborative 210 Washington St N Easton, MA 02356	385-278-0287	kim@justcelc.com
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**Roman Catholic Archbishop of San Francisco
Limited Service List**

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U.S. Trustee, Registered ECF User	Office of the United States Trustee	Attn: Jason Blumberg Attn: Trevor R Fehr Attn: Jared A. Day 501 I Street, Ste 7-500 Sacramento, CA 95814		jason.blumberg@usdoj.gov Trevor.Fehr@usdoj.gov jared.a.day@usdoj.gov USTP.Region17@usdoj.gov
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**Roman Catholic Archbishop of San Francisco
Limited Service List**

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*NOA - Request for Notice	R.F.	Attn: Kim Dougherty, Esq. Just Law Collaborative 210 Washington St N Easton, MA 02356	385-278-0287	kim@justcelc.com
*NOA - Request for Notice	R.F. Jr.	Attn: Kim Dougherty, Esq. Just Law Collaborative 210 Washington St N Easton, MA 02356	385-278-0287	kim@justcelc.com
*NOA - Counsel for Appalachian Insurance Company	Robins Kaplan LLP	Attn: Christina M. Lincoln 2121 Ave of the Stars, Ste 2800 Los Angeles, CA 90067	310-229-5800	clincolin@robinskaplan.com
*NOA - Counsel for Appalachian Insurance Company	Robins Kaplan LLP	Attn: Melissa M D'Alelio Attn: Taylore E Karpa Schollard Attn: Michele N Detherage 800 Boylston St, Ste 2500 Boston, MA 02199	617-267-8288	mdalelio@robinskaplan.com tkarpa@robinskaplan.com mdetherage@robinskaplan.com
*NOA - Request for Notice	Rosalie Marcic	Attn: Jeannette A. Vaccaro, Esq. 315 St., 10th Fl San Francisco, CA 94104	415-366-3237	jv@jvlaw.com
*NOA - Counsel for Interested Party First State Insurance Company, Registered ECF User	Ruggeri Parks Weinberg LLP	Attn: Annette P Rolain Attn: Joshua Weinberg 1875 K St NW, Ste 600 Washington, DC 20006-1251		Arolain@ruggierlaw.com jweinberg@ruggierlaw.com
Corresponding State Agencies	San Francisco County Clerk	1 Dr Carlton B Goollett Pl City Hall, Room 168 San Francisco, CA 94102		
Corresponding State Agencies	San Francisco Tax Collector	c/o Secured Property Tax P.O. Box 7426 San Francisco, CA 94120		
Corresponding State Agencies	San Mateo County Tax Collector	555 County Center, 1st Floor Redwood City, CA 94063		
Debtor's Counsel, Registered ECF User	Sheppard, Mullin, Richter & Hampton LLP	Attn: Ori Katz Attn: Alan H Martin 4 Embarcadero Ctr, 17th Fl San Francisco, CA 94111-4109		amartin@sheppardmullin.com katz@sheppardmullin.com
Debtor's Counsel, Registered ECF User	Sheppard, Mullin, Richter & Hampton LLP	Attn: Jeannie Kim Attn: Ori Katz		jekim@sheppardmullin.com dgatmen@sheppardmullin.com okatz@sheppardmullin.com LSegura@sheppardmullin.com lwidawskyleibovici@sheppardmullin.com
*NOA - Counsel for Century Indemnity Company, Pacific Indemnity Company, and Westchester Fire Insurance Company	Simpson Thacher & Bartlett LLP	Attn: Andrew T Frankel Attn: Michael H Torkin 425 Lexington Ave New York, NY 10017	212-455-2502	afrankel@stblaw.com michael.torkin@stblaw.com
*NOA - Counsel for Century Indemnity Company, Pacific Indemnity Company, and Westchester Fire Insurance Company, Registered ECF User	Simpson Thacher & Bartlett LLP	Attn: Pierce A MacConaghy 2475 Hanover St Palo Alto, CA 94304	650-251-5002	pierce.macconaghy@stblaw.com janie.franklin@stblaw.com

**Roman Catholic Archbishop of San Francisco
Limited Service List**

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*NOA - Counsel for Westport Insurance Corporation, formerly known as Employers Reinsurance Corporation, Registered ECF User	Sinnott, Puebla, Campagne & Curet, APLC	Attn: Blaise S Curet 2000 Powell St, Ste 830 Emeryville, CA 94608	415-352-6224	bcuret@spcclaw.com
*NOA - Counsel for Interested Party First State Insurance Company , Registered ECF User	Smith Ellison	Attn: Michael W Ellison 2151 Michelson Dr, Ste 185 Irvine, CA 92612	949-442-1515	mellison@sehlaw.com
Corresponding State Agencies	State of California Franchise Tax Board	P.O. Box 942867 Sacramento, CA 94267		
Debtor	The Roman Catholic Archbishop of San Francisco	One Peter Yorke Way San Francisco, CA 94109		
Corresponding State Agencies	Virginia Department of Taxation	P.O. Box 1115 Richmond, VA 23218		
Corresponding State Agencies	Virginia Employment Commission	P.O. Box 26441 Richmond, VA 23261		